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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

Barkley & Associates, Inc.
Plaintiff,
v.
Raymond Zakhari et al.,
Defendants.

Case No. 2:24-cv-03645 MEMF(PVCx)
Request to Enter Default Against
Defendants Ayman Asayed, Zeyed Asayed
and Iceberg LLC
Judge: Maame Ewusimensah Frimpong

Plaintiff Barkley & Associates, Inc. requests the Clerk enter default against defendants Ayman Asayed and Iceberg LLC under FED. R. CIV. P. 55(a) because neither defendant answers the “First Amended Complaint [Dkt. 29]. The proof of service on Iceberg [Dkt. 34], is Exhibit 1. Defendant Raymond Zakhari also appeared [Dkt. 30] (“Defendant Raymond Zakhari’s Answer to Plaintiff’s Amended Complaint”). Plaintiff cannot serve defendants Ayman Asayed and Zeyed Asayed.

On May 28, 2025,¹ A. Asayed, Z. Asayed, and Iceberg LLC moved to dismiss for lack of personal jurisdiction [Dkt. 36] (Ex. 2). The motion did not follow this Court’s motion rules (see Dkt. 37 (“Notice to Filer of Deficiencies”) (Ex. 3). The Court struck the motion because defendants, as:

¹ All dates that follow are from 2025.

1 the moving party failed to meet and confer as required by Lo-
2 cal Rule 7-3 and the Courts Civil Standing Order prior to the
3 filing of the Motion to Dismiss [ECF No. 36]. Accordingly, the
4 Motion to Dismiss is STRICKEN, and the parties are OR-
5 DERED to meet and confer about the issues raised in the mo-
6 tion in conformity with Local Rule 7-3 and the Civil Standing
7 Order, which may be found at the Courts website.

8 Dkt. 40 – June 17 (Ex. 4).

9 Barkley’s attorney’s Tamsut and defendant Ayman Asayed had a
10 telephone meet and confer on July 17. No other defendant took part. Mr.
11 Asayed said he did not plan to move to dismiss and neither he nor Iceberg
12 intended to take part in the lawsuit. Tamsut Decl. ¶ 7.

13 Since then, Mr. Asayed and Iceberg neither answered the complaint
14 nor filed any Rule 12 motion.

15 Entry of default against both defendants is proper.

16 October 27, 2025

/s/ Brian Tamsut

Brian Tamsut

SOCAL IP LAW GROUP LLP

Attorney for Plaintiff Barkley &
Associates Inc.

21 **PROOF OF SERVICE**

22 I declare under penalty of perjury of the laws of the United States
23 that on October 27, 2025, I served “Request to Enter Default Against De-
24 fendants Ayman Asayed, Zeyed Asayed and Iceberg LLC” to attorneys for
25 all defendants by e-mail to Omero@banuelos-law.com

26 October 27, 2025

/s/ Anneliese Lomonaco

Anneliese Lomonaco